

Judgment Evidence [ECF No. 252] (the “Motion”), to be held in the above-referenced matter, set for **Thursday, February 20, 2025, at 9:30 a.m.**

WITNESSES

Trustee may call the following witnesses to testify at any hearing on the Motion, whether in person or by affidavit, declaration or proffer:

Ex. No.	Description
1	Any witnesses called or designated by any other party; and
2	Any witnesses necessary to rebut or impeach the testimony of any witness called or designated by another party.

Trustee reserves the right to amend and supplement this witness list.

EXHIBITS

Trustee may offer into evidence any one or more of the following exhibits¹ at the hearing on the Motion:

Ex. No.	Description
	Any exhibit identified or offered by any other party.
	Any rebuttal exhibit.
	Any exhibit necessary for impeachment purposes.

Trustee reserves the right to amend and supplement this exhibit list.

RESERVATION OF RIGHTS

The foregoing witness and exhibit list is being submitted based on information reasonably available to Trustee at this time and without waiving any objection as to relevance, materiality, or admissibility of evidence in this litigation. Trustee reserves the right to ask the Court to take

¹ Each exhibit listed includes any attachments or exhibits thereto, unless otherwise noted herein.
CHAPTER 7 TRUSTEE’S WITNESS AND EXHIBIT LIST

judicial notice of pleadings, transcripts, and/or other documents, and to supplement or amend this

Witness and Exhibit List at any time before any hearing held on the Motion.

Dated: February 19, 2025

Respectfully submitted,

/s/ Katharine Battaia Clark

Nicole L. Williams (SBN 24041784)

Katharine Battaia Clark (SBN 24046712)

Thompson Coburn LLP

2100 Ross Avenue, Suite 3200

Dallas, Texas 75201

Phone: (972) 629-7100

Fax: (972) 629-7171

nwilliams@thompsoncoburn.com

kclark@thompsoncoburn.com

and

Boris Treyzon (CA SBN 18893)

Admitted *Pro Hac Vice*

Jonathon Farahi (CA SBN 324316)

Admitted *Pro Hac Vice*

Abir Cohen Treyzon Salo, LLP

16001 Ventura Boulevard, Suite 200

Encino, California 91436

Phone: (424) 288-4367

Fax: (424) 288-4368

btreyzon@actslaw.com

jfarahi@actslaw.com

and

Brian S. Engel (SBN 00789279)

Steve P. Turner (SBN: (20314700)

Barrett Daffin Frappier Turner & Engel, LLP

580 La Ventana Blvd.

Driftwood, Texas 78619

Phone: (512) 687-2503

Fax: (512) 477-0008

brianen@bdfgroup.com

stevet@bdfgroup.com

ATTORNEYS FOR PLAINTIFF

RANDOLPH N. OSHEROW,

CHAPTER 7 TRUSTEE, DEBTORS' ESTATE

CERTIFICATE OF SERVICE

I hereby certify that, on February 19, 2025, a true and correct copy of the foregoing document was served to the below listed parties via electronic means as listed on the Court's ECF noticing system or by electronic mail.

VIA EMAIL

K&L Gates, LLP
Brent D. Hockaday
1717 Main Street, Ste. 2800
Dallas, TX 75201
brent.hockaday@klgates.com

VIA EMAIL

Bell Nunnally & Martin LLP
Jeffrey S. Lowenstein
Beverly A. Whitley
Brent A. Turman
Sydney A Shimkus
2323 Ross Ave., Ste 1900
Dallas, TX 75201
jlowenstein@bellnunnally.com
bwhitley@bellnunnally.com
bturman@bellnunnally.com
sshimkus@bellnunnally.com

/s/ Katharine Battaia Clark

Katharine Battaia Clark